

1 COOLEY LLP
JOHN C. DWYER (136533) (dwyerjc@cooley.com)
2 Five Palo Alto Square
3000 El Camino Real
3 Palo Alto, CA 94306-2155
Telephone: (650) 843-5000
4 Facsimile: (650) 849-7400

5 COOLEY LLP
RYAN E. BLAIR (246724) (rblair@cooley.com)
6 4401 Eastgate Mall
San Diego, CA 92121
7 Telephone: (858) 550-6000
Facsimile: (858) 550-6420

8 Attorneys for Defendants
9 Geron Corporation, John A. Scarlett and Olivia K. Bloom

10 *[Additional attorneys listed on signature page]*

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA

14
15 In re: GERON CORPORATION
SECURITIES LITIGATION

Case No.: 14-cv-01224-CRB

CLASS ACTION

**STIPULATION AND ORDER RE
BRIEFING SCHEDULE FOR LEAD
PLAINTIFF TO FILE CONSOLIDATED
AMENDED COMPLAINT AND
DEFENDANTS' RESPONSE THERETO**

Judge: Hon. Charles R. Breyer
Courtroom: 6, 17th Floor

16
17
18
19
20
21 This Document Relates To: All Cases
22
23
24
25
26
27
28

Pursuant to Civil Local Rule 7-12, Lead Plaintiff Vinod Patel (“Lead Plaintiff”) and defendants Geron Corporation, John A. Scarlett, and Olivia K. Bloom (“Defendants,” and collective with Lead Plaintiff, the “Parties”), hereby agree and stipulate to the following schedule for the filing of Plaintiff’s Consolidated Amended Complaint (“CAC”) and Defendants’ response thereto.

WHEREAS, on March 14 and 28, 2014, two putative class action complaints were filed in this District against Defendants for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

WHEREAS, on April 14, 2014, the Court entered an Order relating the two putative class actions and assigning the two putative class actions to this Court (Dkt. No. 14);

WHEREAS, on April 15, 2014, the Court entered an Order requiring the Parties to meet and confer and to submit a schedule for the filing of the CAC and Defendants’ responses thereto within twenty (20) days following the appointment of Lead plaintiff and Lead Counsel (Dkt. No. 15);

WHEREAS, on June 30, 2014, the Court entered an Order consolidating the two putative class actions under the caption *In re Geron Corporation Securities Litigation* and appointing Vinod Patel as Lead Plaintiff and Faruqi & Faruqi, LLP as Lead Counsel for Lead Plaintiff and the putative class (Dkt. No. 42);

WHEREAS, counsel for the Parties have met and conferred on a schedule for the filing of the CAC and Defendants’ responses thereto, and have taken into account the schedules of the Parties and their counsel, as well as the holiday season, in so doing; and

NOW, THEREFORE, IT HEREBY STIPULATED AND AGREED by the Parties hereto, through their undersigned counsel, as follows:

1. Lead Plaintiff shall have until September 19, 2014 to file and serve his CAC.
2. Defendants shall have until November 18, 2014 to file and serve their answer, Motion to Dismiss, or other response to the CAC.
3. Lead Plaintiff shall have until January 20, 2015 to file and serve his papers in opposition to any Motion to Dismiss filed by Defendants.

1 4. Defendants shall have until February 18, 2015 to file and serve their reply briefs in
2 connection with their Motion to Dismiss.

3 5. The Parties shall meet and confer on a hearing date for the Motion to Dismiss,
4 subject to the Court's availability.

5 6. The Parties are not waiving any rights, claims, or defenses of any kind except as
6 expressly stated herein, and the Parties reserve the right to seek further extensions of time as
7 circumstances may warrant, subject to the Court's approval.

8 IT IS SO STIPULATED.

9 Dated: July 18, 2014

COOLEY LLP
JOHN C. DWYER
RYAN E. BLAIR

12 /s/ Ryan E. Blair

13 Ryan E. Blair (246724)

14 *Counsel for Defendants*
15 *Geron Corporation, John A. Scarlett and Olivia K.*
16 *Bloom*

17 Dated: July 18, 2014

FARUQI & FARUQI LLP
DAVID E. BOWER
RICHARD W. GONNELLO
MEGAN M. SULLIVAN

20 /s/ Richard W. Gonnello

21 Richard W. Gonnello (*Pro Hac Vice*)

22 *Counsel for Lead Plaintiff*

ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: July 18, 2014

COOLEY LLP
JOHN C. DWYER (136533)
RYAN E. BLAIR (246724)

/s/ Ryan E. Blair

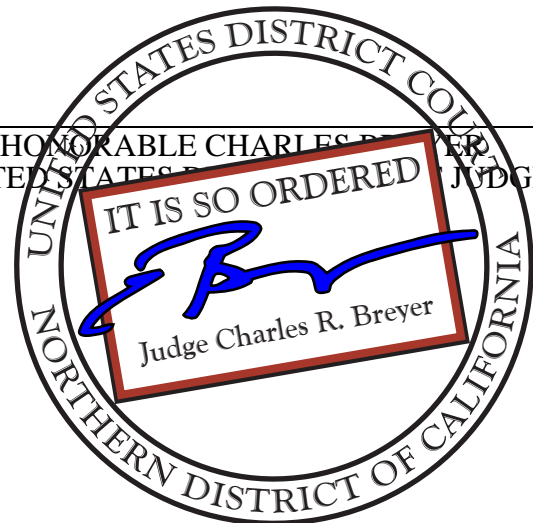
Ryan E. Blair (246724)

*Counsel for Defendants
Geron Corporation, John A. Scarlett and Olivia K.
Bloom*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: July 21, 2014

THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT COURT
JUDGE



108935557 v1